E-GOV FOR PLANNING AND NEPA (ePLANNING)

PRIVACY IMPACT ASSESSMENT

MARCH 23, 2004

PROJECT CODE P-306

PLANNING, ASSESSMENT, AND COMMUNITY SUPPORT GROUP (WO-210)
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A. CONTACT INFORMATION:

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any personal information about individuals?

Yes.

Entry of the following personal information is required on the ePlanning Interactive Digital Document's Comment Submission form:

➤ The first and last names of individual members of the public expressing their opinions on selected text or maps presented in a given Land Use Plan's Interactive Digital Document.

➤ Indication from the user whether or not their comments can be made public in forthcoming publications.

➤ General comments in the form of typed text regarding selected text or map elements found in a given Interactive Digital Document. There is no control over the content of the comments returned from individual members of the public; any manner of personal information could conceivably be entered here.

Optionally, the following personal information can also be entered into a Land Use Plan's Comment Submission form:

➤ The mailing address, email address, telephone number, organization, and title of individual members of the public expressing their opinions on selected text or maps in the subject Interactive Digital Document.

➤ A future version of the Comment Submission form is expected to support an attachment upload function where members of the public can optionally append their text comments on selected sections of a given Land Use Plan with a separate document file. No content control over comment amendments received from the public can be exerted here; any manner of personal information could conceivably be provided in this manner.

Land Use Plans under review in the ePlanning paradigm will still accept comments from the public in traditional forms, such as by letter, fax, and email. Using Back Office web-based tools, Planners are required to enter the following personal information regarding an individual expressing comments on a given Plan:

➤ The first and last name.

➤ The written content of the letter, email, or fax received from the given individual.

➤ Indication whether or not the comments in question can be made public in forthcoming publications.

a. Is this information identifiable to the individual?

Yes.

b. Is the information about individual members of the public?

Yes.

c. Is the information about employees?

Yes.

ePlanning Back Office user accounts are stored in a relational database table and include the following information besides username and password: the first and last names of employees who own ePlanning accounts, employee email addresses, and the assigned access-levels employees are granted to the document content in given ePlanning projects.

Changes to RMP documents created and managed through the ePlanning Back Office software are audited based on the username of the logged on Bureau employee. This constructs a document history where changes can be tracked over time and tied to particular employees.

2) What is the purpose of the system/application?

E-Gov for Planning and NEPA (ePlanning) consists of the following components:

➢ A set of web-based Back Office tools available to Land Use Plan writers and editors used for composing, managing, and publishing Land Use Plan text and cartographic content.

➢ A web-based Interactive Digital Document interface used for presenting Land Use Plan versions to the public. During a Plan's comment phase, the Interactive Digital Document includes a Comment Submission form used for gathering public input, storing it in a back-end database.

➢ A set of web-based Back Office tools available to Planners facilitating the review and response process for comments obtained through a Plan's public Interactive Digital Document and traditional methods such as mailed letters, faxes, and emails.

"ePlanning," is a project initiative that delivers and allows user-initiated manipulation of land use planning information that consists of fully integrated text with intelligent and interactive maps and map layers. To accomplish this, ePlanning provides automated tools and information technology so that planning teams can simply create these integrated documents as BLM does land use planning.   Some related goals are to: Provide a common look, feel, and functionality for BLM planning documents through enterprise solutions, establish a new and efficient method for public participation in the planning process, create reusable data for processing post-planning actions, create an administrative record, and move land use planning from a project to a process. ePlanning establishes a new mechanism for land use planning that allows for an openly participative, collaborative, and community-based land use planning system envisioned in the BLM Planning Manual.

3) What legal authority authorizes the purchase or development of this system/application?

Taylor Grazing Act, 43 U.S.C. 315, 316; Federal Land Policy and Management Act, 43 U.S.C. 1701; 49CFR s 1601- Resource Management Planning.

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

➢ The names (first and last) of individual members of the public who expressed opinions on selected sections of a Plan's Interactive Digital Document are included in the system. Optionally, mailing address, email address, phone number, organization, and title may also be included as information entered by public users and stored along with their names.

➢ Employees who use ePlanning Back Office tools are recorded in the system via their individual user accounts which are created in a back-end relational database table. Creating a Back Office user account requires entering the names (first and last), email addresses, access-levels, and ePlanning specific usernames and passwords of employees into the system.

2) What are the sources of the information in the system?

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

The source of information is always obtained from the individual either directly via the Interactive Digital Document Comment Submission form or through traditional means such as letters, fax, and emails which are later entered into the comment analysis system by Bureau Planners using the Back Office tools.

b. What Federal agencies are providing data for use in the system?

None.

c. What Tribal, State and local agencies are providing data for use in the system?

None.

d. From what other third party sources will data be collected?

None

e. What information will be collected from the employee and the public?

From the public, the following information must be collected in order for their comments to be processed through the ePlanning system:

➢ First name, last name, and comment text.

➢ Indication from the user whether or not their comments can be made public in forthcoming publications.

Depending on whether it is provided, the following information about members of the public making comments on a given Land Use Plan is also recorded in the ePlanning system:

➢ Mailing address, email address, phone number, title, and organization.

No information is collected on government employees using the ePlanning software, other than an audit trail of editing transactions tied to a user's logon account and maintained by the ePlanning Back Office application.

f. What opportunities do members of the public have to decline to provide information or consent to particular uses of information? How does the public grant consent?

As the ePlanning Front Office comment submission form now stands, a member of the public wishing to provide a comment on a published Land Use Plan must provide their name, the typed text of their comment, and indication of whether their name should remain unpublished and kept in confidence to the extent allowed by FOIA. Consent or denial of name publication is given by selecting clearly marked "Yes" or "No" option buttons on the form.

All mandatory pieces of information on the comment submission page are clearly marked with red asterisks. Descriptions of the meaning of the red asterisks are prominently displayed at the top and bottom on the form.

Submission of a comment is a two stage process; a member of the public must click the "Submit" button in the first form to reach a new window where an overview of their comment is presented for review. The "Submit" button must be clicked again at this point to actually post the comment to the database. The option to clear the comment contents or exit the comment submission process is available at all stages.

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOI records be verified for accuracy?

Not applicable. Comments from the public on Land Use Plans must be processed and responded to regardless of inaccuracies in their content.

b. How will data be checked for completeness?

A parent letter or comment from the public cannot be entered into the ePlanning system without the minimum required information (first name, last name, comment text, and indication of whether the comments can be made public). The content of comment text is not evaluated; all comments must be processed regardless of their perceived "completeness".

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Comments from the public regarding a specific Land Use Plan are received during a window of opportunity referred to as the "comment period", typically 60 days in length. After the cut-off date for submitting comments is reached, the Plan's comment database is frozen; all data contained therein is considered current in the context of the given Plan.

d. Are the data elements described in detail and documented? If yes, what is the name of the document?

Land Use Planning does not have a data model. Data is acquired through lands, resources, and minerals programs. ePlanning is based largely on creation of text data, similar to desktop publishing.

ePlanning Software Requirements and Design Specifications are contained in the project files in Washington Office wo-210: i/eplanning/ITIB REQUIRED DOCUMENTATION/*.*

D. ATTRIBUTES OF THE DATA:

1) **Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

   Yes.

2) **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

   No.

3) **Will the new data be placed in the individual's record?**

   No, see number 2 above.

4) **Can the system make determinations about employees/public that would not be possible without the new data?**

   No.

5) **How will the new data be verified for relevance and accuracy?**

   Not applicable. See number 4 and section C.3 above.

6) **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

   In the pilot-phase of implementation, the BLM employee and contractor users of the ePlanning Back Office tools access the system with a user ID and password passed through ESRI's Central Authentication System (CAS). The CAS portal site has been designed to use SSL for secure encryption of communications. The use of strong passwords is currently not enforced.

   Plans are in development to transfer the Back Office ePlanning application from ESRI and bring the system under control of in-house IT resources (i.e. running it on BLM servers and networks), once ePlanning matures beyond the pilot stage. Care will be taken during this transition to address all identified security concerns; integrating ePlanning into the BLM Application Security System (BASS) or a similar security module is a likely scenario.

   Once authenticated and logged on to the ePlanning Back Office application, users are restricted in their ability to change data based on their assigned access-level (writer/editor, author, etc.). Each user group has specific data modification privileges based on their job functions.

7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

Yes. Only system users described in number 6 above have access to the data. The same controls described there apply here.

8) How will the data be retrieved?   Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

A unique identifier is assigned to all parent letters stored in the ePlanning database. Information can be retrieved using a variety of query types packaged by the Back Office application, including by the name of an individual submitter who composed a given letter.

9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

The ePlanning Back Office module supporting comment management and analysis provides a function to sort and display Land Use Plan comments by the submitter's name. This view of the comment data is available only in the web-based Back Office application, which is secured from public access. There are no reporting functions in ePlanning that pertain specifically to personally identifying information.

The final Interactive Digital Documents for Land Use Plans, often called the ePlanning Front Office interface, will likely contain representative comments from members of the public and corresponding responses from government Planners. Only comments and parent letters where express publication permission was given by submitters will be used in this capacity.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

ePlanning is designed to be a centralized, web-based application system. However, the nature of the piloting process has necessitated distributing system components to the developer's site and a national BLM center. Consistent use of the system across all Plans in development is enforced through standard database models and mandatory interaction with these databases using standardized web-site templates and application interfaces. Once the system has matured and become centrally located, these same standards will be used to enforce consistent use.

2) What are the retention periods of data in this system?

Land Use Plan comments are perpetual records but do not need to be readily accessible once a plan is considered final. Archival, off-line storage is the likely fate for most Plans' comment databases.

The presentation of a final Land Use Plan is a long-term proposition governed under BLM policy. Fifteen to twenty years is a reasonable estimation for the length of time a Plan's final text and cartographic content could remain "live" on Bureau web sites.

When or if it is determined a Plan's final version can be removed from public access, it will certainly be archived for perpetual storage off-line.

3) **What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

See number 2 above.

4) **Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No.

5) **How does the use of this technology affect public/employee privacy?**

Not applicable. See number 4 and section C.2 above

6) **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

The system provides the capability retrieve and sort Land Use Plan comments by submitter name or address information. When a comment or parent letter is found through any of the above methods, the returned information contains the submitter's name along with the mailing address, phone number, email address, title, or organization if such data was provided during comment submission.

The functionality described above is not available to the general public, however, as it is encapsulated in the Back Office tools to be used by BLM Planners.

7) **What kinds of information are collected as a function of the monitoring of individuals?**

Individuals are not expressly monitored by any functionality contained in the "back office" ePlanning utilities.

8) **What controls will be used to prevent unauthorized monitoring?**

Access to ePlanning Back Office tools is currently controlled by user IDs and passwords passed through ESRI's Central Authentication System (CAS). A future, centralized configuration of the ePlanning Back Office system under BLM control will likely incorporate BASS or a similar security module and be accessible only from the BLM intranet or through VPN connections.

9) **Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

Not applicable at this point in the project life-cycle.

10) **If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.**

No. Data and system purposes have not changed.

F. **ACCESS TO DATA:**

1) **Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)**

   BLM authorized employee users, managers, system administrators and contractors will have access to data in this system.

   Distribution of final Land Use Plan decisions in electronic and printed forms will contain representative examples of public comments and will be available publicly in a variety of formats. The use of an individual's comments in a final Plan document is contingent solely on whether they have provided express permission to do so during the comment submission process.

2) **How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

   Currently, access to the ePlanning Back Office system utilities is controlled as followed:

   ➢ Application user ID and password are passed through ESRI's Central Authentication System (CAS) to gain access to the "back office" modules.

   ➢ The supplied user account name and password are authenticated by the application at the initial ePlanning Back Office login screen.

   ➢ Permission groups (writer/author, editor); each permission group has specific access restrictions to ePlanning functionality and document components.

   All criteria, procedures, controls and responsibilities regarding access are documented in the ePlanning Requirements Specification, User Guide, DOI security policy, etc.

3) **Will users have access to all data on the system or will the user's access be restricted? Explain.**

   No. User access is restricted to those areas for which they have responsibilities, as discussed in number 2 above. A certain class of users for each Land Use Plan will have unhindered access to the complete data set as each Plan has administrators who control a document's structure, distribute authoring tasks, and control comment analysis.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)**

   Transactions (update, insert, delete) are audited in the system and tied back to specific users by their account names. Access to ePlanning Back Office modules is limited to BLM personnel and authenticated by ESRI's Central Authentication System (CAS). In a future BLM-maintained implementation, access will likely be restricted to BLM users authenticated for Intranet access and certified by BASS (or a similar security module). In all cases, access to the back-end system is restricted to those individuals deemed necessary to work on a given Land Use Plan or to support the IT architecture running ePlanning. Training in correct operating procedures will be provided for both categories of users.

5) **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system**? **If yes, were Privacy Act**

contract clauses inserted in their contracts and other regulatory measures addressed?

Contractors were involved with the design and development of the system and will be involved with the operations and maintenance of the system.

All contractors are through the GSA schedule or onsite support contracts, which comply with all requirements of the Privacy Act.

6) Do other systems share data or have access to the data in the system? If yes, explain.

No.

7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

All BLM employees and contractors have been trained in their security responsibilities and are limited to specific system granted functions.

8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other (e.g., Tribal))?

No.

9) How will the data be used by the other agency?

Not applicable. See number 8 above.

10) Who is responsible for assuring proper use of the data?

Not applicable. See number 8 above.

Signature Page

The Following Officials Have Approved this Document

1) **System Manager**

   ___/S/ Carl Zulick_____   **(Signature)** **Date: _____**

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Title: Project Manager, E-Gov for Planning and NEPA (ePlanning)

2) **Bureau IT Security Manager**

   __/S/ David Cavallier_____   **(Signature)** **Date: _____**

Name: David Cavallier

3) **IT Security Manager**

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Name: Barb Troyer

Title: Acting Installation IT Security Manager

4) Privacy Act Officer

__/S/ John Livornese_____   (Signature)   Date: __ _____ ___

    Name: John Livornese

    Title: BLM Privacy Act Officer

5) Bureau CIO

__/S/ Ronnie Levine_____   (Signature)   Date: __ _____ ___

    Name: Ronnie Levine

    Title: CIO / AD-IRM